



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMORANDUM ENDORSED

BY ECF

The Honorable Gregory Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 27, 2023

USDC SDNY
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Re: *United States v. Jose De Jesus Mendoza, 23 Cr. 552 (GHW)*

Dear Judge Woods:

The Government respectfully writes to request that Beatriz Virgen be withdrawn as co-signer to defendant Jose De Jesus Mendoza's personal recognizance bond. Ms. Virgen has stated that she wants to withdraw as co-signer.

On September 24, 2023, the defendant was arrested just as he was about to enter a hotel room in New Jersey carrying a suitcase containing 17 bricks of cocaine. Two days later, on September 26, 2023, the defendant was charged by complaint with conspiring and agreeing with others to distribute and possess with intent to distribute 5 kilograms and more of cocaine, and presented telephonically before Magistrate Judge Ona Wang. Judge Wang ordered the defendant released with conditions, including a \$50,000 bond to be secured by two financially responsible co-signers by October 10, 2023. On October 10, 2023, the defendant requested a one-week extension to obtain another co-signer (ECF No. 7), which Magistrate Judge Figueredo granted (ECF No. 8). That co-signer was Ms. Virgen. She was sworn to the bond on October 17, 2023.

Two days later, on October 19, 2023, Ms. Virgen called the Government, informing the undersigned that she wished to withdraw as co-signer from the bond, that she had expressed that same desire to the defense counsel, and that she also asked defense counsel what steps she needed to withdraw. The Government reached out to the Clerk's Office, copying defense counsel, inquiring as to what steps Ms. Virgen needed to take. The Clerk's Office later informed the Government that a motion from either party would be sufficient. Ms. Virgen informed the Government yesterday that she still wishes to withdraw from the bond, therefore the Government now moves to withdraw her from the defendant's bond.

Thank you for your consideration of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Edward C. Robinson Jr.

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cc: Counsel of Record (by ECF)

Application granted. Ms. Virgen is withdrawn from the defendant's bond. The deadline for Mr. Mendoza to obtain an alternative co-signer is November 13, 2023.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 12.

SO ORDERED.

Dated: October 28, 2023
New York, New York



GREGORY H. WOODS
United States District Judge